

## REMARKS/ARGUMENTS

Upon entry of this amendment, which amends claims 1, 2, 4-10, and 14-61, claims 1-2, 4-10, and 14-62 remain pending. In the Office Action, claims 2, 4-10, 14-28, and 30-60 were rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter that Applicants regard as the invention; claims 1, 9, 14-44, and 61 were rejected under 35 U.S.C. § 102(e) as being anticipated by Ludwig (U.S. Patent No. 6,816,904); and claims 45-60 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Ludwig. Applicants respectfully request reconsideration of the claims in view of the amendments above and the remarks below.

### Examiner Interview

Applicants thank the Examiner for the courtesy of the conference held May 10, 2006. During the conference, the claims and references were discussed.

### Section 112 Rejections

Applicants have amended claims 2, 4-10, 14-18, and 30-60 to recite proper antecedent basis for the claims. Applicants submit these claims now fully comply with Section 112.

### Claim Rejections

Claim 1 was rejected under 35 U.S.C. § 102(e) as being anticipated by Ludwig. Applicants submit that claim 1 does not disclose or suggest every element of claim 1, as amended. For example, Ludwig does not disclose or suggest an application programming interface residing in the audio/video filing system. Further, Ludwig fails to disclose or suggest a first set of function calls to manipulate the storage layer when an audio/video file is detected and a second set of function calls to manipulate the storage layer when a non-audio/video file is detected.

Ludwig discloses an A/V network manager 34 that provides an application program interface (API). This API allows client application programs to request A/V and/or multimedia switching and/or conferencing services. Applicants submit that the API in Ludwig does not disclose or suggest an application program interface residing in the

audio/video filing system. Rather, the API in Ludwig is a network interface to request networking services in an A/V network 30. *See Ludwig*, Fig. 3.

Applicants also submit that Ludwig does not disclose or suggest that the API is adapted to select a first set of function calls to manipulate the storage layer when an audio/video file is detected and to select a second set of function calls to manipulate the storage layer when a non-audio/video file is detected. Ludwig may disclose an AVSM 160 and may issue a set of high level requests. *See Ludwig*, col. 19, lines 46-61. Also, Ludwig may disclose a multimedia file that may include an A/V file and application file. *See Ludwig*, col. 22, lines 32-53. Nowhere is it disclosed or suggested in Ludwig that the API is adapted to select a first set of function calls and a second set of function calls. At best, Ludwig discloses multimedia files that may include different types of information. However, two sets of function calls that are selected is not disclosed or suggested. Applicants respectfully request that the Examiner indicate where Ludwig discloses or suggests two sets of function calls. Also, the selection of the first or second set of function calls based on whether the file is a non-audio video file or an audio/video file is not disclosed or suggested by Ludwig. The multimedia file is processed in Ludwig but a selection of function calls based on the information in the multimedia file is not disclosed or suggested.

Accordingly, Applicants respectfully request withdrawal of the rejection of claim 1. Claims 2, 4-10, and 14-28 depend from claim 1 and thus derive patentability at least therefrom. Accordingly, Applicants respectfully request withdrawal of the rejections of claims 2, 4-10, and 14-28.

Applicants submit that claims 29-62 should be allowable for at least a similar rationale as discussed with respect to claim 1.

Applicant respectfully submits that the present claims are in condition for allowance and an early Notice of Allowance is earnestly sought. The undersigned may be contacted at the telephone number below at the Examiner's convenience if it would help in the prosecution of this matter.

Respectfully submitted,

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